MA0003913

September 25, 1989

Acushnett Company-Rubber Division-Plant B 744 Belleville Ave New Bedford, MA 02742

Dear Mr. Bailey:

Regarding the submittal of your discharge monitoring reports. In the future please mail your DMR's to the following address.

Environmental Protection Agency Compliance Branch P.O. Box 8127 Boston, MA 02114

Thank you for your cooperation regarding this matter

Sincerely

Martha Bosworth

EPA Technical Assistant

Subject: Draft Pemit of Public notes for the Contact Person = Mr. Jack Berily Date: Jely 31, 1986 I called Mr. Tach Baily about the chieft penit for Acushnet Co. Rubba Div. We went ever the semit limits of monitoring requirements and he said he has no problem with what, Since the plant well shot down from 8-4- to 8-15, he will not be able to review the draft permit when we send it in to 14 day review. I asked hem since he has no problem with the Imits what if we send the dialt permit to public notice and ship the 14 days review period. Mr. Barby Le has no problem with ther. Cerneta S. CAR



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

MA 0003912

REGION I

J. F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203

MA0003913

March 25, 1987

Mr. Jack Baily, Jr.
Manager of Safety and Security
Acushnet Company
Rubber Division
P.O. Box E916
New Bedford, MA 02742-0916

Dear Mr. Baily:

It has come to my attention that the permit issued to Acushnet Company on November 20, 1986, contained an error. The permit limitation for Oil & Grease should be 9.3 lbs/day as daily max. and 3.3 lbs/day as monthly average. We have changed the permit accordingly and herein enclose a copy of the corrected page for your record. Thank you.

Sincerely yours,

T.E. Landry, Acting Chief Induscrial Permit Section

cc: Glenn Gilmore, DEQE

George Harding, EPA-Compliance Branch

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

1. During the period beginning on the effective date and lasting through the expiration date the permittee is authorized to discharge from outfall serial number 001, non-contact cooling water, belt cooling waters.

Such discharges shall be limited and monitored by the permittee as specified below:

Effluent Characteristic	Discharge Limi	Monitoring Requirements			
			Measurement	Sample	
	Avg. Monthly	Max. Daily	Frequency	Туре	
Flow-m ³ /Day (MGD)	-	- · · · · · · · · · · · · · · · · · · ·	Continously	Daily Avg.	
Chromium Total	-	0.3 mg/l	Quarterly	Composite	
Chemical Oxygen Demand (COD)	Monitor		Monthly	Composite	
Oil & Grease	3.3 lbs/day	9.31bs/day 0r	Monthly	Grab	
Total Suspended Solid (TSS)	9 lbs/day	15 mg/l 18 lbs/day	Monthly	Composite	

The pH shall not be less than 6.5 standard units nor greater than 8.0 standard units and shall be monitored monthly, report range of 8 grabs.

There shall be no discharge of floating solids or visible foam in other than trace amounts.

Complex taken in compliance with the monitoring requirements specified above shall be taken at the following locations: point of discharge.

Facility or discharge location

Name ACUSHNET COMPANY, RUBBER DIVISION, PLANT B

Street 744 Belleville Ave.

City New Bedford

State/Zip code MA 02745

Telephone number (including area code) 617-997-2811

MA 0003913

ST PERMIT NUMBER

001 DIS . (20-21) (22-23) (24-25)

REPORTING PERIOD: FROM 8 7 0 2 01

8 7 0 2 28 YEAR MO DAY

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see INSTRUCTIONS on back

RemarksTitleist Golf Division Laboratory

* The 12 open container grab samples were collected over the sampling day, and examined, then combined into one composite sample for analysis

(32-37)	·											(64-66)	(69-70)
PARAMETER		(3 card only) (38-45)	QUANT	1TY _(54-61)		(62-63)	(4 card only) (38-45)	CONCENT (46-53)	RATION (54-61)		(62-63)	FREQUENCY	SAMPLE
PARAMETER		MINIMUM	AVERAGE	MAXIMUM	UNITS	NO. EX	MINIMUM	- AVERAGE	MAXIMUM	UNITS	NO. EX	ANALYSIS	TYPE
77.017	REPORTED	•446	•478	. 548	W G 5							30/30	24 HR* OMPOSITE
FLOW	PERMIT	_			M.G.D.	12.5							
OTT AND OD	REPORTED	*,	4.3		LBS/	0						1/30	24 HR* омровіте
OIL AND GR	EASE PERMIT CONDITION		3,3	9.3	Day								
m c c	REPORTED		13.4		T DC/	0						1/30	24 HR* OMPOSITE
T.S.S.	PERM:T CONDITION		9.0	18.0	LBS/ Day]			
C.O.D.	REPORTED							7.8		ma /1	0	1/30	24 HR* OMPOSITE
С.О.В.	PERMIT CONDITION							MONITOR		mg/1			
PH	REPORTED						7.3	7.5	7.7	STD.	0	12/30	24 HR.* OMPOSITE
	PERMIT CONDITION						6.5		8.0	UNITS			
CR	REPORJED							< 0.05		mg/1	0	1/90	24 Hr * COMPOSITE
	PERMIT CONDITION							0.3					
	REPORTED				-	27645	***************************************				OCPRO	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	
	PERMIT CONDITION									-			
	REPORTED		*******************			20.000	************************		***************************************	,	1000000		*************
	PERMIT												
NAME OF PRINCIPAL	EXECUTIVE OFFICER		OF THE OFFICER		DATE			liar with the info			\mathbb{Z}_{p}		
JEPSON, JO		General N	Vice President & 8 7 0 3 140 report and that to the best of my knowledge and belief such information is true, complete, and accurate.										
													×4

Read these instructions before completing form:

After reading and understanding instructions and forms, please return acknowledgement card.

Sampling and testing procedures should follow those published in 40 C.F.R. 136. These are basically Standard Methods or EPA procedures.

Forms should be completed in triplicate for each discharge with copy each for EPA, state and your records. If the state requires a more frequent submittal than EPA, collate EPA's copies and send as required.

Enter permittee name and facility address, PERMIT NUMBER, discharge number and reporting period. (A separate page is required for each discharge.)

For each parameter monitored during the reporting period, (either as a requirement of the permit or for own information) summarize the data as required in the permit and complete the form as follows:

- Parameter column list parameter name.
- Enter minimum, average and maximum values for quantity and/or concentration under appropriate column headings.
 - a. If frequency is once per month or less, enter the one value under average and leave minimum and maximum blank.
 - b. 1b/day (pounds per day) equal_s flow (in million gallons per day) times concentration (in mg/l) times 8.34.
 Example: 2.5 MGD x 30 mg/l BOD x 8.34 = 625.5 lb BOD/day
 - c. MGD equals gallons per minute times 1440.
- 3. Enter units as appropriate.

MGD - million gallons per day
lb/day - pounds per day
mg/l - milligrams per liter
SU - standard units for pH
°F - degrees fahrenheit
kg/day - kilograms/day = lb/day
2.2
(other units may be used as necessary)

- 4. Specify the number of samples that exceeded the maximum (and/or minimum, as appropriate) in the columns "NO. EX." If none, enter "O". If there are any violations, send a letter of explanation.
- 5. Specify frequency of analysis as number of analyses/ number days (3/7 is three analyses per every 7 days, 1/7 is weekly, 1/30 is once a month, 30/30 is daily, 1/90 is quarterly & 1/180 is semiannually) If continuous, enter "CONT"
- 6. Specify sample type ("grab" or "_hr. composite") If frequency was continuous enter "NA."

Indicate person or laboratory performing analytical work under Remarks.

Print name and title of person responsible for monitoring and reporting and sign and date the form.

Mail state copy to appropriate state agency and EPA copy to

Environmental Protection Agency Permits Branch Box 8127 Boston, MA 02114

When supply of forms will be exhausted within 2 months, send reorder form or reproduce forms yourself.

Facility or discharge location

Name

ACUSHNET COMPANY, RUBBER DIVISION, PLANT B

Street

744 Belleville Ave.

City New Bedford State/Zip code MA 02745

Telephone number (including area code) 617-997-2811

MA 5 T

0003913

REPORTING PERIOD: FROM

001 Dis (20-21) (22-23) (24-25)

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8 7 0 1 3L YEAR MO DAY see INSTRUCTIONS on back

Remarks Titleist Golf Division Laboratory *The 12 open container grab samples were collected over the sampling day, and examined, then combined into one composite sample for analysis

(32-3	7)												(64-68)	(69-70)
			(3 card only) (38-45)	QUANT (46-53)	(54-61)			(4 card only) (38-45)	CONCENT (46-53)	RATION (54-61)		(62-63)	FREQUENCY	SAMPLE
PARAME	TER .		MINIMUM	AVERAGE	MAXIMUM	UNITS	NO. EX	MINIMUM	AVERAGE	MAXIMUM	UNITS	NO. EX	ANALYSIS	TYPE
FLOW		REPORTED	.385	.507	.589				•	,			30/30	N.A.
FLOW		PERMIT CONDITION				M.G.D.								
OIL AND	CREASE	REPORTED		7.9		LBS/	0	. ,					1/30	24HR* COMPOSI
OIL AND	CREASE	PERMIT		3.3	9.3	Day								
T.S.S.		REPORTED		3.1		LBS/	0			1			1/30	24 HR* COMPOSI
		PERMIT CONDITION		9.0	18.0	Day								
C.O.D.		REPORTED					الربيعا		5.8		mg/1	0	1/30	24 HR* COMPOSI
		PERMIT CONDITION							MONITOR					
РН		REPORTED	·					7.2	7.4	7.6	STD.	0	12/30	24 HR* COMPOSI
		PERMIT						6.5		8.0	UNITS			
CR		REPORTED							< 0.05		mg/1	0	1/90	24 HR* COMPOSI
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Enter permittee name and facility address, PERMIT NUMBER, discharge number and reporting period. (A separate page is required for each discharge.)

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 Example: 2.5 MGD x 30 mg/l BOD x 8.34 = 625.5 lb BOD/day
 - c. MGD equals gallons per minute times 1440.
- 3. Enter units as appropriate.

MGD - million gallons per day
lb/day - pounds per day
mg/l - milligrams per liter
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kg/day - kilograms/day = 1b/day
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(other units may be used as necessary)

- 4. Specify the number of samples that exceeded the maximum (and/or minimum, as appropriate) in the columns "NO. EX." If none, enter "O". If there are any violations, send a letter of explanation.
- 5. Specify frequency of analysis as number of analyses/ number days (3/7 is three analyses per every 7 days, 1/7 is weekly, 1/30 is once a month, 30/30 is daily, 1/90 is quarterly & 1/180 is semiannually) If continuous, enter "CONT"
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Indicate person or laboratory performing analytical work under Remarks.

Print name and title of person responsible for monitoring and reporting and sign and date the form.

Mail state copy to appropriate state agency and EPA copy to

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Facility or discharge location

Name The Acushnet Company-Rubber Division, Plant B

Street 744 Belleville Ave.

City New Bedford

State/Zip code Ma 02745

Telephone number (including area code) 617 - 997-2811

MA 0003913

ST PERMIT NUMBER

001

REPORTING PERIOD: FROM 8 6 1 2 01

YEAR MO DAY

to 8 6 1 2 3 1 YEAR MO DAY

see INSTRUCTIONS on back

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(32-37)	· · · · · · · · ·							(64-68)	(69-70)					
PARAMETER		(3 card only) (38-45)	QUANT (46-53)	1TY (54-61)		(62-63)	(4 card only) (38-45)	CONCENT (46-53)	RATION (54-61)		(62-63	FREQUENCY	SAMPLE	, , (
		MINIMUM	AVERAGE	MAXIMUM	UNITS	NO.	MINIMUM	AVERAGE	MAXIMUM	UNIŢS	NO. EX	ANALYSIS	TYPE	
: .	REPORTED	UNK	.550	UNK	MGD	0	,		-		0	CONT.	NA	
Water flow est.	PERMIT CONDITION													
Chromium Total	REPORTED							.05			Ò	1/90	24 Hr.*	
·	PERMIT CONDITION							,3		mg/1		1/90		
aon	REPORTED							12.9		mg/1	0	1/30	24 Hr.*	
COD	PERM: T CONDITION							MONITOR				1/30		
Oil and Grease	REPORTED		5,5		,	0				٠		1/30	24 Hr.*	
	PERMIT CONDITION	3.3		9.3	Lbs/da	y						1/30		
TSS	REPORTED		0.5		T1-/1-	0					·	1/30	24 Hr/*	
· · · · · · · · · · · · · · · · · · ·	PERMIT	9.0		18.0	Lbs/da	y				·		1/30		C
РН	REPORTED						7.2	7.4	7.5	SU .	0	12/30	24 Hr.	•
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NAME OF PRINCIPAL EXECUTIV	E OFFICER		OF THE OFFICER		DATE	I cert	ify that I am fami	liar with the infor	mation contained i	n this	M	111/	VV	
JEPSON, JOHN	MI	Exec.Vice General M	Presiden anager	t & 8 7	6 0 60	ination is tide, comprete, and acculate.					'L			
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SU - standard units for pH

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(other units may be used as necessary)

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Environmental Protection Agency
Permits Branch
Box 8127
Boston, MA 02114

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File



March 12, 1987

Mr. George Harding
Permit Compliance Section
Compliance Branch
Water Management Division
Environmental Protection Agency
JFK Federal Building
Boston, MA 02203

RECEIVED

MAR 18 1987

COMPLIANCE BRANCH

Dear Sir:

After conversations with Ted Landry of your office, I am including monthly copies of our discharge monitoring report forms for the months of December 1986, January 1987 and February 1987.

Under our old permit system, established in 1976, we previously reported semi annually and misinterpreted the monthly reporting requirement.

As explained to Mr. Landry, we will be forwarding these reports on a monthly basis from this point forward.

Please note that the water flow figures for the month of December 1986 were estimated as our new flowmeter had not been calibrated and was not functioning during the 24 hours period when the water samples were taken for analysis.

We regret any inconvenience my oversight may have caused.

Discharge report forms will be forwarded on a timely basis from this point forward.

Thank you for your assistance.

Sincerely,

ACUSHNET COMPANY

John J. Bailey Jr., C.S.P. Manager of Safety and Security

/rg

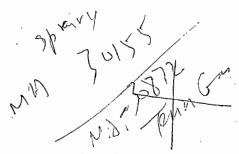
Enc.

CC: K. Chin

ACUSHNET COMPANY
RUBBER DIVISION

The Company

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Mr. Kenneth Chin Compliance Branch Water Management Division Environmental Protection Agency JFK Federal Building Boston, MA 02203

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MAR 1 9 1987

COMPLIANCE BRANCH

ACUSHNET COMPANY

March 12, 1987

Mr. Kenneth Chin Compliance Branch Water Management Division Environmental Protection Agency JFK Federal Building Boston, MA 02203

Dear Mr. Chin:

As we discussed, I recently discovered that our newly issued discharge permit # MA 0003913 and the draft copy contained what appears to be a typographical error.

Under the discharge limitations for oil and grease, the average monthly limit was previously established as 3.3 Lbs. per day and was listed on the draft copy as .33 Lbs. per day. Also, the maximum daily limit was listed as 9.3 Lbs. per day and was printed on our new permit application as .93 Lbs. per day. The concentration limit for this item was correctly listed on both the old and the new permit as 15 mg/l.

Unfortunately, I did not detect the problem on the draft copy before it was sent to public hearing but noticed it instead while preparing the annual environmental reports.

I would appreciate your assistance in rectifying the problem. I have enclosed a copy of the draft effluent limitation and monitoring requirements which lists the typographical error.

I apoligize for any inconvenience that this oversight may have caused.

Thank you for your continued support and assistance.

Sincerely,

ACUSHNET COM

John J. Mailey Jr., C.S.P.

Manager of Safety and Security

/rg

Enc.

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

1. During the period beginning on the effective date and lasting through the expiration date the permittee is authorized to discharge from outfall serial number 001, non-contact cooling water, contact cooling waters.

Such discharges shall be limited and monitored by the permittee as specified below:

Effluent Characteristic	Discharge Limitations	Monitoring Requirements Measurement Sample
	Avg. Monthly Max. Daily	Frequency Type
Flow-m ³ /Day (MGD)		Continously Daily Avg.
Chromium Total	- 0.3 mg/l	Quarterly Composite
Chemical Oxygen Demand (COD)	Monitor	Monthly Composite
Oil & Grease	0.331bs/day .93 1bs/day or 15 mg/1	Monthly Composite
Total Suspended Solid (TSS)	9 lbs/day 18 lbs/day	Monthly Composite

The pH shall not be less than 6.5 standard units nor greater than 8.0 standard units and shall be monitored monthly, report range of 8 grabs.

There shall be no discharge of floating solids or visible foam in other than trace amounts.

Samples taken in compliance with the monitoring requirements specified above shall be taken at the following locations: point of discharge.





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

J. F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203

February 26, 1987

Mr. Frank Mangano McCord Winn, Inc. 620 Washington St. Winchester, MA 01890

Re: Minor modification of NPDES Permit MA0001279 issued on February 10, 1987

Dear Mr. Mangano:

It has come to my attention that the permit modification issued to McCord Winn on February 10, 1987, contained an error. The modification expiration statement on the front page should have read as follows: "This permit modification and authorization to discharge shall expire at midnight, February 18, 1991." We have changed the modification accordingly and herein enclose a copy of the corrected cover page for your record. Thank you.

Sincerely yours,

T.E. Landry, Acting Chief Industrial Permit Section

cc: Glenn Gilmore, DEQE

Subject: Azushner Co. Rebber Div. - Ste Inspection.
To = File
From: Kerneih S. HS

Date: June 16, 1986

The purpose of the site inspection were to resolve the permit application (or no application from the company) status and preparation for permit rensurance.

I not with Mr. Jack Baily manager for safty cent continent Control. Mr. Baily had just gointed the company recently and childrest unlerstand why EPPS didn't send or require the company to reapply for the company seperi discharge permit. The company bad been sendeng montowhy reports to the company had been sendeng montowhy reports to EPPA (To Shelly Reb). He would like to resolve it asap.

I tomad the plant with Mr. Banky, the products that they make are basicly rubben products. They purchased the rubben and shapper it (or make it) to the final products. The deschape are from wen-contact cooling and cooling water

from the belt cooling process, This consust a belt that carry the shaped products from one end to the other and the belt then in contact with the starting point. The products themself don't contact the water at all. The company had tile -in it's chromitian plating waste to the town sewer back in the late 1970 and had keen monitored for chromiting as required by the espired permit The data Indiente Chronium discharge are less than the present that and below detection /init. I asked Mr. Barby to feel cont the application ASAP and if he has any que, Thom, call one





RECEIVED - EPA

SEP 24 1986

September 17, 1986

COMPLIANCE BRANCH

Mr. Kenneth Chin Environmental Engineer U.S. Environmental Protection Agency J.F. Kennedy Building Boston, MA 02203

Re: NPDES Application # MA0003913

Dear Mr. Chin:

This letter is to acknowledge receipt of the priliminary draft application which we received on September 8, 1986. We feel we are in agreement with the requirements as outlined in the permit application for performance and testing.

It appears to be consistent with our past practices established in 1976. We will continue testing under previous agreements while awaiting final approval of our new permit.

We would like to thank you and your staff for the assistance provided us throughout our application process.

Sincerely,

ACUSHNET COMPANY

John J. Bailey, Jr., C.S.P. Manager of Safety and Security

JJB/rg

CC: J. Jepson-Vice President



ACUSHNET COMPANY

September 26, 1986

RECEIVED - EPA

1986

COMPLIANCE BRANCH

Mr. Jim O'Connell Project Review Coordinator Coastal Zone Management Office Room 006 - 20th Floor 100 Cambridge Street Boston, MA 02202

Dear Mr. 0'Connell:

This letter will serve to confirm our telephone conversation regarding requirements of consistency determination required by Massachusetts Coastal Zone Management and by applicable Federal Agencies.

We request that you review our Federal Consistency Determination for our permit renewal application for our 21 inch water outfall. We are referring specifically to NPDES Application # MA 0003913.

We feel that the proposed activity complies with the policies of the Massachusetts approved Coastal Management program and will be conducted in a manner consistent with such policies. The project will directly effect the Massachusetts Coastal Zone and the Acushnet River and we request your priliminary concurrence that our project to renew our outfall permit is consistent to the maximum extend practicable with the CZM program.

You have been provided with a copy of our draft permit and additional application support data is attached. Our permit is pending EPA approval and awaiting your preliminary concurrence.

We have addressed the applicable consistency policy and our project relates to them as follows:

MCZM Policy 1. Protect ecology significant resource areas.

Permit Renewal Project. There is no dredging or construction activity plans surrouding the outfall. Essentially, we have been discharging non-contact cooling water through our 21" outfall directly into the Acushnet River. The wetlands in the immediate area appear to be protected.



Page 2 Mr. Jim O'Connell

- MCZM Policy 2. Protect complexes of the marine resource areas of unique productivity.
- Renewal Permit Project.

 Due to the contamination existing in the River, we are not aware of any unique marine resources or aqua culture involved. We feel however that our discharge would in fact complement the habitat and encourage future growth of marine complexes.
- MCZM Policy 3. Support attainment of national water quality goals for all waters of coastal zone through coordination with existing water quality planning and management agencies.
- Renewal Permit Project. We believe that controlling our discharge and water quality thereof will support this goal in accordance with Federal and State effluent limitations and water quality standards.
- MCZM Policy 4. Contruction and water bodies and contigous lands to minimize interference with circulation, sediment transport and to protect water quality.
- Renewal Permit Project. The proposed project will not interfer with water circulation. Because of the size of the outfall the anticipated flow rate and the variance from ambient air temperature, we feel that the local area will not be nor has been affected by our outfall.
- MCZM Policy 5. Minimizes adverse affects from dredging and dredge material disposal.
- Renewal Permit Project. Since there is no dredging nor construction involved in the renewal of our permit, we feel we are consistent with policy # 5.
- MCZM Policy 6. Accommodate off shore sanding gravel mining needs in the area and in the ways that will not adversely affect marine resources and navigation.
- Renewal Permit Project. Again, our repermitting of our outfall does not apply to this policy and our project will not affect it.



Page 3
Mr. Jim O'Connell

MCZM Policy 7. Maritime commerce and development in designated port areas.

Renewal Permit Project. At the point of our outfall, the River is not commercially navigable and we feel that this policy is not applicable to our permit renewal request.

MCZM Policy 8. For coastal dependent energy facilities consider siting in alternative coastal locations.

Renewal Permit Project. Does not involve energy falilities and is not applicable to our permit renewal request.

MCZM Policy 9 a and 9 b. Accommodate exploration development and production of offshore oil and gas resources and evaluate indigenous alternative sources of energy.

Renewal Permit Project. Again, our proposed project is not applicable to this policy and is not energy related.

MCZM Policy 10. All development must conform to consisting applicable State and Federal requirements governing sub-surface waste discharges, sources of air and water pollution and protection of the inland wetlands.

RENEWAL PERMIT PROJECT. In accordance with our application permit, prior test data and our work to continue to maintain these standards, we feel we are in compliance with policy # 10.

MCZM Policy 11. Protect designated scenic rivers in the coastal zone and sign free areas.

Renewal Permit Project. Since the outfall has been in operation for over 20 years, we feel we are in compliance with this policy in that the area is sign free from this water discharge including wetland areas.

MCZM Policy 12. Review proposed developments in or near designated or registered historic districts or sites to ensure that Federal, State, and private actions requiring a State permit respect their preservation intent.

Renewal Permit Project. To the best of our knowledge, there are no designated historic districts or sites that would be impacted. The outfall has been functioning in excess of 20 years and has not brought about apparent changes in the River or coastal area.



Page 4
Jim O'Connell

MCZM Policy 13. Review developments proposed near existing public recreation sites in order to minimize their adverse impacts.

Renewal Permit Project. This policy is not applicable to the proposed project for renewal of our water discharge permit. There are no coastal related public recreation sites in the vicinity of the project.

Should you have any questions regarding our conformance to CZM policies or with regard to the attached permit application and draft, please do not hesitate to contact me. I am available during normal business hours at 617-997-2811 Ext. 3710.

We would like to thank you for the time and assistance provided us in helping to conclude the process of renewing our outfall permit application.

Sincerely,

ACUSHNET COMPANY

John J. Bailey, Jr., C.S.P. Manager of Safety and Security

JJB/rg

CC: Kenneth Chin Compliance Engineer



November 2, 1982

Mr. Richard Chretien
Department of Environmental Quality Engineering
Division of Water Pollution Control
One Winter Street
Boston, Massachusetts 02108

Re: Cooling Tower Treatment Chemicals

Dear Mr. Chretien:

Enclosed is the information you requested for blowdown of Dearborn Chemical water treatment chemicals. If any questions should arise, please call me at (617) 997-2811, extension 2549.

Westboro Sero

Sincerely,

ACUSHNET COMPANY

Joseph P. Lala Chemical Engineer

JPL/qm

Enclosure

DEARBORN CHEMICAL COMPANY

Subsidiary of W.R. GRACE & CO.

October 27, 1982

Mr. Joe Lala Acushnet Company Plant A Slocum Street Acushnet, Massachusetts 02742

Dear Joe,

The following information is that which you requested for the DEQE:

- A. pH of tower blowdown will be 8.0-8.5
- B. None of the products in use contain any priority pollutants.
- C. Bioassay data:

POLYMATE 986

LC-50

96 hours = 1800 trout

= 1800 sunfish

DEARCIDE A-III

LC-50

96 hours = 1.8 ppm trout

= 3.8 ppm sunfish

DEARCIDE 716

LC-50

96 hours = .8 ppm trout

= 1.2 ppm sunfish

Note: Total bleed from all six towers will be approximately 600 gallons per day. 986 concentration will be approximately 300 ppm in bleed.

A total of 1.5 gallons (total to all six towers) of biocide will be added once each week. Discharge will be less as these products are biodegradable.

Please call if you have any more questions.

Sincerely,

Roy H'. Tangen

Water Treatment Consultant

RHT/df



ANTHONY D. CORTESE, Sc. D. Commissioner

Te Commonwealth Massachusetts Executive Office of Environmental Affairs Department of Environmental Quality Engineering Division of Water Pollution Control One Winter Street, Boston 02108

October 22, 1982

Acushnet Company, Golf Division Post Office Box B965 New Bedford, Massachusetts 02741 Re: Cooling Tower Treatment Chemicals

Attention: Joseph Lala

Dear Mr. Lala:

This is in response to your request concerning the use of water treatment chemicals and their discharge via cooling tower blowdown. The chemicals proposed for use are Dearborn Chemical Polymate 986, Dearborn A-111, and Dearborn 716. Additional information which the Division needs in order to evaluate these materials is the concentration of any compounds contained in these products which is considered toxic under the Federal Clean Water Act Section 307(a)(1). (See attached list.) Also, it is requested that Dearborn provide any toxicity data for aquatic organisms for these products.

If the cooling tower blowdown is found to be non-toxic and meets the following parameters, the Division would approve the discharge when combined with the 600,000 gallons of once through cooling water discharged through outfall 010:

cooling tower blowdown characteristics

flow: 3000 gpd maximum

TSS: 5 lb. max. COD: 5 lb. max.

pH: 6-9

If the combined discharge remains within all permits limits for the existing discharge, there does not appear to be a need to modify the NPDES Permit.

If you have any questions, please contact Richard Chretien of this office.

Very truly yours,

Thomas C. McMahon Director

TCM/RRC/wp Attachment

cc: Ed Chin, Environmental Protection Agency, Permits Branch



ACUSHNET COMPANY

May 26, 1978

RECEIVED

Mr. Thomas C. McMahon, Director

WAY 3 0 1078;
Water Resources Division, Commonwealth of Massachusetts
Division of Water Pollution Control
110 Tremont Street

Boston, Massachusetts 02108

Re: Thomas C. McMahon vs Acushnet Company Notice of Compliance

Dear Mr. McMahon:

This is in reference to the Modified Agreement for Judgment executed by us on November 16, 1977. Provision 4.e on page 2 requires that Acushnet submit progress reports relative to construction on or before June 1, 1978 and subsequent specified dates.

In our previous report of March 22 of this year we notified you that we had entered into a construction agreement with Paul G. Cleary & Co., Inc. Since that time a construction permit has been obtained and construction commenced.

More specifically, all new catchbasins and all new manholes shown on Charles T. Main, Inc. Site Location Plan, Drawing No. C-1, have been completed and installed. All new six-inch cast iron pipe and the six-inch ductile iron force main and the twelve-inch E.S. clay pipe shown on the same drawing have been installed. Excavation of the required hole for the pumping station is in progress and sheathing is now being installed. In our opinion, our progress thus far is slightly ahead of the schedule specified in the Modified Agreement.

Please consider this letter to be a written Notice of Compliance as required not later than fourteen (14) calendar days after June 1, 1978 by Provision 5, page 3, of the Modified Agreement for Judgment.

Very truly yours,

ACUSHNET COMPANY

John R. Duggan/n Assistant Treasurer

cc: Mr. John Hackler, Permits Branch - U.S. E.P.A.

Ms. Gloria Ann Fry, Esq., Asst. Attorney General, Environmental Protection
Division

Roger E. Titus, Esq., Abramson, Titus and Putman

CERTIFIED MAIL - 816636

RETURN RECEIPT REQUESTED
P.O. BOX E916, NEW BEDFORD, MASS. 02742 • TEL. (617) 997-2811



ACUSHNET COMPANY

May 26, 1978

Mr. John Hackler
Permits Branch
Environmental Protection Agency, U. S.
John F. Kennedy Building
Boston, Massachusetts 02203

Re: Thomas C. McMahon vs. Acushnet Company Notice of Compliance

Dear Mr. Hackler:

Enclosed is a copy of the notice to the Massachusetts Division of Water Pollution Control of compliance with Provision 4.e on page 2 of the Modified Agreement for Judgment. (i.e. progress report)

Please consider this letter to be a written Notice of Compliance, as required in Provision 5, page 3, of the Modified Agreement for Judgment.

Very truly yours,

ACUSHNET COMPANY

John R. Duggan

Assistant Treasurer

1n

cc: Mr. Thomas C. McMahon, Director Water Resources Division, comm. of Mass.
Ms. Gloria Ann Fry, Esq. - Asst. Attorney General, Environmental Protection
Division

Roger E. Titus, Esq., Abramson, Titus, and Putman

CERTIFIED MAIL - 816635 RETURN RECEIPT REQUESTED

RECEIVED

497

May 13, 1977

MASS LIVISION OF CONTROLL

Mr. Richard A. Cavagnero
Sanitary Engineer
Permits Branch
U. S. Environmental Protection Agency
Region 1
J. F. Kennedy Federal Building
Boston, Massachusetts 02202

RE: NPDES Permit #MA0003912

Dear Mr. Cavagnero:

- The Boiler Room sumps are ready for the pumps. We have confirmation that the pumps will be delivered before the end of May. We expect to complete this installation by June.
- 2. Laboratory sump is complete.
- 3. Underground and outside work substantially complete.
- 4. The flowmeter will not be installed as planned. The City of New Bedford has not required flow volumes to the sewer at this time.

We feel we have substantially completed the proposed plan with the exception of the boiler sump pumps. We will report when that installation is complete.

Yours truly, ACUSHNET COMPANY

Ed Gilliss for

E. Gillisse:vm

CC: S. Coors, Weston & Sampson Engineers, 10 High Street, Boston, Mass.02110
The Commonwealth of Massachusetts, Water Resources Commission, Division
of Water Pollution Control, Leverett Saltonstall Building, Boston, Mass.
02202



d. SERO

April 4, 1977

Mr. Richard A. Cavagnero
Sanitary Engineer
Permits Branch
U. S. Environmental Protection Agency
Region 1
J. F. Kennedy Federal Building
Boston, Massachusetts 02202

RE: NPDES Permit #MA0003912

Return Receipt Requested

Dear Mr. Cavagnero:

- 1. The collection and recirculation system for the hydraulic fluid has been installed and operating. This means that oil-laden hydraulic fluid is no longer discharged to the river. We noticed we were also entrapping significant amounts of grease in the system. The overall effect should be a significant change in grease and oil content in the discharge water.
- 2. Boiler Room has been continued and the sumps will be ready when pumps are delivered late in April.
- 3. The Lab sump is about 75% complete. Pump is now on hand and installation should be completed by April 15.
- 4. Underground and outside work scheduled for completion by May 1, 1977.

Yours truly, ACUSHNET COMPANY

E. Gillisse:vm

CC: S. Coors, Wester & Sampson Engineers, 10 High Street, Boston, Mass. 02110

The Commonwealth of Massachusetts, Water Resources Commission, Division of Water Pollution Control, Leverett Saltonstall Building, Boston, Mass. 02202

File

Mayle Sol



February 18, 1977

Mr. Richard A. Cavagnero
Sanitary Engineer
Permits Branch
U. S. Environmental Protection Agency
Region 1
J. F. Kennedy Federal Building
Boston, Massachusetts 02203

RE: NPDES Permit #MA0003912

February Progress Report

RETURN RECEIPT REQUESTED

Dear Mr. Cavagnero:

Please excuse the delay in issuing this report. I have been involved with an OSHA inspection the last two weeks.

This is out status:

- Largis Plumbing is still working in the plant almost daily.
- 2. Weather still prevents outside work.
- 3. Work has started on the boiler and Laboratory sumps.
- 4. One of the four drain sumps in the hydraulic system has been fabricated and installed. The second unit has been fabricated. The other two are delivered and will be installed by March 15.

Yours truly, ACUSHNET COMFANY

E. Gillisse:ym

CC: S. Coors. Wester & Sampson Engineers, 10 High Street, Boston, Mass. 02110
The Commitwealth of Massachusetts, Water Resources Commission, Division
of Water Pollution Control, Leverett Saltonstall Building, Boston, Mass.
02202.
File



January 7, 1977

Mr. Richard A. Cavagnero
Sanitary Engineer
Permits Branch
U. S. Environmental Protection Agency
Region 1
J. F. Kennedy Federal Building
Boston, Massachusetts 02203

RE: NPDES Permit #MA0003912 December Progress Report. •RETURN RECEIPT REQUESTED

Dear Mr. Cavagnero:

The following is the status of our project as of 1/3/77.

- 1. Langis Plumbing is continuing almost daily, in our in-plant work.
- 2. The weather prevented continued work on outside underground work. Expected completion, unless we get favorable conditions this winter, is May 1, 1977.
- 3. The special pumps for the boiler feed sump system have been ordered with delivery by April 29, 1977.
- 4. The hydraulic closed loop system will be installed by Acushnet Company. The pump/filter system has been ordered on P.O. B15951, with delivery by 1/10/77. The stainless steel tanks have been ordered on P.O. B15863 with delivery by 1/17/77. Expected total installation completion of this phase is 2/15/77.

As this is a major contributor to the oil and grease level contamination, this installation will be a major factor in our compliance to the permit.

Yours truly, ACUSHNET COMPANY

Gellesse

E. Gillisse

vm

CC: S. Coors, Weston & Sampson Engineers, 10 High Street, Boston, Mass. 02110
The Commonwealth of Massachusetts, Water Resources Commission, Division
of Water Pollution Control, Leverett Saltonstall Building, Boston, Mass.
02202.
File

RUBBER DIVISION • P.O. BOX E916, NEW BEDFORD, MASS, 02742 • TEL. (617, 997-2811

t Boston Mass 02110



November 30, 1976

CERTIFIED MAIL - RETURN RECEIPT

Mr. Richard A. Cavagnero
Sanitary Engineer, Permits Branch
U.S. Environmental Protection Agency
Region 1
J. F. Kennedy Federal Building
Boston, Massachusetts 02203

Dear Mr. Cavagnero:

Re: NPDES Permit #MA0003913
Your letter of 11/4/76

This letter is intended to confirm our telephone conversation about your letter of November 4, 1976.

Our specific progress to date is:

- \$25,000 has been appropriated for the necessary plumbing work.
- Langis Plumbing & Heating of New Bedford has been issued a purchase order (our P.O. #B14989) to do the work. He has started on the job.
- We have completed the design of the hydraulic system. This will be a closed loop system so none of the hydraulic or press drains will enter either the river or the sanitary lines. This has been simplified in its design and will be done by in-house plumbers.

We expect to have all contaminated waste streams eliminated from the river discharge on or before March 15, 1977. The primary problem in completion at a later date than expected is a long delivery on the sump pumps for the boiler sump area. The plumber is working on several companies to improve delivery but as of November 1 the promises were 12 to 14 weeks.

I will issue a progress report on December 30 or before if we get a better delivery date promise.

Sincerely,

ACUSHNET COMPANY

LA Gilliere

Edward Gillisse

Plant Engineering Manager

CC: The Commonwealth of Massachusetts, Water Resources Commission, Division of Water Pollution Control, Leverett Saltonstall Building, Boston, Mass. 02202

49 W.

November 4, 1976

CERTIFIED MAIL-RETURN RECEIPT

Mr. Edward Gillesse Plant Engineering Manager Acushnet Company Rubber Division P. O. Box E916 New Bedford, MA 02742

Dear Mr. Gillesse:

Re: NPDES Permit MA0003913

This letter concerns the status report submitted on September 19, 1976. You state that completion of production-oriented work will be accomplished during Christmas week. Does this include the work on the boilers and hydraulic system? If not, when will the latter work be completed, that is, when will all contaminated waste streams be eliminated from the Acushnet River?

Please telephone me at 617/223-5005 to further explain this situation or submit a letter of clarification as soon as possible.

Sincerely yours,

Richard A. Cavagnero Sanitary Engineer Permits Branch

RAC:dl

PETOD 1976

MATER POLLUTION CONTROL



H Bonu Ms

September 29, 1976

Mr. Richard A. Cavagnero
Permits Branch
United States Environmental Protection Agency
Region 1
J. F. Kennedy Federal Building
Boston, Mass. 02203

RE: NPDGS Permit No. MA0003913 Status.

Dear Mr. Cavagnero:

Our schedule called for initial work to begin during our annual shutdown during the July 4th. week. We did not receive approval of our engineering plans, by the Division of Water Pollution Control, until July 14, 1976, too late to incorporate into our shutdown schedule.

Our present plan calls for work to be started during the long week end of Thanksgiving, November 25-28. Completion of production oriented work will be accomplished during Christmas week.

Our Plant works 5-1/2 to 6 days, 24 hours per day. The work connected with the boilers and hydraulic system on the presses can be done only during an extended production shutdown period.

We are amending our contract with Weston & Sampson to do additional design work on the hydraulic system, plus sub contractor construction assistance. We are scheduling contractors in for bids for the work in the next couple of weeks.

Weston & Sampson are currently under contract to do the monthly water discharge quality checks. They can be contacted for information on these checks.

Sincerely yours, ACUSHNET COMPANY

E. Gillisse, Plant Engineering Manager

RECTION

CC: Thomas C. McMahon, Director, Division of Water Pollution Control, The Commonwealth of Mass., Water Resources Commission, Leverett Saltonstall Building, Government Center, 100 Cambridge St., Boston, 02202 Constephen H. Corr, Associate, Weston & Sampson Engineers, 10 High St., 1000 Boston, Massachusetts 02110

EG: vm

SEP # 2 1976

CERTLEIED MAIL - RETURN RECEIPT REQUESTED

September 21, 1976

Mr. Edward-Gillisse Plant Manager Acushnet Company Rubber Devision 744 Belleville Avenue New Bedford, MA 02740

Re: NPDES Permit No. MA0003913

Dear Mar. Gillisse:

Your existing NPDES permit required that final effluent limitations be met by July 2, 1976. An extension to September 1, 1976 for completion of construction was requested in Weston and Sampson's letter of November 25, 1975. This extension was granted in my letter of December 2, 1975.

Within ten (10) days of receipt of this letter, you are directed to submit the following:

- 1. Status of tie in of all contaminated waste screams to the Hew Bedford sewerage system.
 - 2. Information on remaining cooling water discharges.

Sincerely yours,

Richard A. Cavagnero Sanitary Engineer Permits Branch

MDWPC - Beston
MDWPC - Southeast Regional Office
Stephen H. Corr, Weston & Sampson Engineers

bcc: Compliance Analyst

RAC/CK

Way

December 2, 1975 Mr. Steven R. Corr. Associate Westen & Sampson Engineers 10 High Street Boston, MA 02110 RE: MA0000913 Acushnet Company Rubber Division Dear Mr. Corr: This will acknowledge receipt of your letter of November 25, 1975 on behalf VG Acushrot Courany. Since the preliminary plane wareapot egospeed untill Movember 12. 1975 and the final plans required will be extensive, we have decided to extend the Feverber 1, 1975 data for final plan submission to April 1, 1976 as requested. Also, the date for completing construction will be extended one month to September 1, 1976. As the permit is presently written, the schedule is for on-site treatment rather than protreatment and connection to the municipal cowexage system. After the protections system is operating and the correction of all contaminated vasion aftered to the cover has been made, the permit will be modified to allow: the Mindring of ecoling voter and stormator. Information on the volumes and temperatures of the cooling water discharges should be submitted as soon as it becomes available. Very truly yours, Rúchard A. Compendro Sanitary Engineer Permits Branch RAC/sv bec: compliance S DIVISION OF LUTION CONTROL

WESTON & SAMPSON ENGINEERS

10 HIGH STREET BOSTON, MASS. 02110

TEL .: AREA CODE 617

G. A. SAMPSON 1915-64 G. G. BOGREN PARTNERS

ROBERT M. POPE LEO F. PETERS

R. S. WESTON

ASSOCIATES

ELIOT F. TUCKER DAVID K. BLAKE STEVEN H. CORR WILLIAM A. PERKINS November 25, 1975

Han- Pleuse curdinate with the

Environmental Protection Agency Permits Branch John F. Kennedy Building Boston, Massachusetts 02202

Attn: Mr. Richard A. Cavagnero

Re: Acushnet Company Wastewater Disposal

Dear Mr. Cavagnero:

Weston and Sampson Engineers in behalf of our client, Acushnet Company, Rubber Division, New Bedford request an extension of time for compliance with the NPDES Permit (Federal No. MA0003913, State No. 497).

An engineering report and preliminary plans were submitted to the Regional Administrator for review and to the Director for approval on September 29, 1975 after our client had obtained a submission date of October 1, 1975.

The NPDES Permit schedule required submission of final plans for review and approval by the Regional Administrator and the Director respectively on November 1, 1975.

Our client received approval of the engineering report and preliminary plans on November 12, 1975. Final plans could not be submitted prior to that date because of the unknown provisions included with the approval.

WATER OF THUS CONTROL

Environmental Protection Agency 2/ Boston, Massachusetts November 25, 1975

On behalf of our client we propose the following schedule to complete the requirements in parts b. and c. of the NPDES Permit Schedule of Compliance:

- 1. The Acushnet Company will confer with and authorize Weston and Sampson to proceed with the engineering design.
- 2. The Acushnet Company will obtain approval from the City of New Bedford to discharge additional wastewaters to the municipal sewerage system.
- 3. Final plans and specifications will be submitted to the Regional Administrator for review and the Director for approval by April 1, 1976.
- 4. Construction of proposed facilities will begin during plant shutdown in July, 1976 with completion by September 1, 1976.

If you have any questions or comments, please contact our office.

Very truly yours,

WESTON & SAMPSON ENGINEERS

Steven H. Corr Associate

SHC/rg

cc: Mr. Thomas C. McMahon, Director MDWPC
Mr. Edward Gillisse, Acushnet Company

4DM-10-74-109109



THE COMMONWEALTH OF MASSACHUSETTS WATER RESOURCES COMMISSION



LEVERETT SALTONSTALL BUILDING, GOVERNMENT CENTER 100 CAMBRIDGE STREET, BOSTON 02202

OFFICE OF THE DIRECTOR DIVISION OF WATER POLLUTION CONTROL

November 12, 1975

Mr. Edward Gillisse Acusimet Company Rubber Division 744 Belleville Avenue

hen Bedford, Massachusetts 02740

Dear No. Oillisso:

Re: New Bedford Acustmet Company Bacimeering Report

The Division of Water Pollution Control has reviewed the report submitted on your behalf by Weston & Sempson Engineers with a letter dated September 29, 1975. The report is titled:

> REPORT TO A CONTRACT C RUBBER DIVISION . THE HUPTED. MASSACHIGERTS SEPTEMBER 1975 LLIGHT & EXERSON THE WAY BUT STATE OF THE DOWN MASSACHMETER

an order contained the negality of a magtewater survey and presents reconcallatival for abartion of all process and century was tas to the mericipal scutting states, and of stormaries and esching waters to the Acustmot River,

The Bivision of Water Pollution Control approves the engineering report subject to the following provisions:

l. Freireatment facilities needed to meet the manicipal sewer ordinance be recommended and submitted for approval.

Mr. Edward Cillisse November 12, 1975 Page 2

- 2. Trichloroethylene degrosser wastes be isolated and disposed of through a licensed hazardous waste contractor rather than discharged.
- 3. Cooling and storm waters be removed from the sanitary sever.
- 4. Approval for connection of the additional waste sources to the sumicipal sewer be obtained from the City of New Bedford.
- 5. The chemical nature of the "Permacol" solution be identified and the approximate volume of its discharge be indicated.

Very truly yours,

Thomas C. NoMahon Director

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cet vestes & Sampson, 10 High Street, Boston, Massachusetts 02110 EPA, Permits Branch, JFK Building, Boston, Massachusetts 02203

bec: William A. Slagle

Weston & Sampson ENGINEERS

10 HIGH STREET BOSTON, MASS. 02110

TEL .: AREA CODE 61 357.5995

G. A. SAMPSON G. G. BOGREN

LEO P. PETERS

R. S. WESTON

ASSOCIATES ELIOT F. TUCKER DAVID K. BLAKE STEVEN H. CORR WILLIAM A. PERKINS WATER POLLUTION CONTROLS

September 29, 1975

Mr. Thomas C. McMahon, Director Division of Water Pollution Control Room 1901 100 Cambridge Street Boston, Massachusetts 02022

> Re: Acushnet Company Wastewater Disposal Report

Lear Mr. McMahon:

Flease find enclosed for your approval two (2) copies of the engineering report on wastewater disposal at the Acretine Commany, Rubber Division, New Bedford. This Report is pertial fulfillment of the Schedule of Compliance in the NPDES permit issued to the Acushnet Company on June 19, 1975, State Permit Number 497.

If you have any questions, please contact this office.

Very truly yours,

WESTON & SAMPSON ENGINEERS

Steven H. Corr

Associate

SHC/sch Enclosures cc - Mr. Edward Gillisse Acushnet Company



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION I

& Brue & Sharen.

J.F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203

September 9, 1975

Mr. Steven H. Corr, Associate Weston & Sampson Engineers 10 High Street Boston, Massachusetts 02110

Dear Mr. Corr:

Re: Acushnet Company, Rubber Division NPDES Permit No. MA0003913 State Permit No. 497

In response to your request of August 29, 1975, EPA will allow your client until October 1, 1975, to submit the engineering report and preliminary plans.

Sincerely yours,

Richard A. Cavagnero Sanitary Engineer Permits Branch

cc: MDWPC

Mr. Edward Gillissee Acushnet Company Rubber Division 744 Belleville Avenue New Bedford, MA 02745

I Com

Weston & Sampson

ENGINEERS

R. S. WESTON 1915-43 G. A. SAMPSON 1915-64 G. G. BOGREN 1946-72

BOSTON, MASS, 02110

TEL : AREA CODE 617 357-5995

PARTNERS ROBERT M. POPE

LEO F. PETERS
ASSOCIATES

ELIOT F. TUCKER
DAVID K. BLAKE
STEVEN H. CORR
WILLIAM A. PERKINS

August 29, 1975

Mr. Thomas C. McMahon, Director
Division of Water Pollution Control
Commonwealth of Massachusetts
Department of Natural Resources
100 Cambridge Street
Boston, Massachusetts 02202

Re: Acushnet Company, Rubber Division

New Bedford

Dear Mr. McMahon:

This letter is being written as a follow-up to telephone conversations with Mr. Hans Bonne of your department and Mr. John Lynch, Permits Section, EPA, regarding our request for an extension of time on the above mentioned project.

The Acushnet Company, Rubber Division, New Bedford, Mass., has been issued an NPDES Permit (Federal Permit No. MA0003913, State Permit No. 497) effective June 19, 1975. The Permit requires that on engineering report and preliminary plans be submitted to the Regional Administrator for review and to the Director for approval by September 1, 1975.

We have encountered considerably more in-plant problem areas than originally were thought to exist. This resulted in more plant investigation man-hour requirements which subsequently delayed the report phase.

Mr. Thomas C. McMahon, Director Boston, Massachusetts August 29, 1975

At present, the report is nearly complete with only minor details left to handle. We request an extension of the compliance schedule to October 1, 1975 to complete the report and send it to the printers. However, we anticipate that the report will be completed before this date and likely can be forwarded by September 15.

Very truly yours,

Alerent Govern

WESTON & SAMPSON ENGINEERS

Steven H. Corr

Associate

cc: Mr. John Lynch

Mr. Edward Gillisse

SHC/bd